

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Grace Galloway, Andy Lesko, and Brenda
Shoss, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

VALVE CORPORATION, a Washington
corporation,

Defendant.

Case No. 2:16-cv-01941-JLR

**STIPULATED MOTION TO
EXTEND CASE DEADLINES**

**NOTE ON MOTION CALENDAR:
May 24, 2021**

I. RELIEF REQUESTED

The Court entered a Scheduling Order on March 2, 2021 (Dkt. #81), setting May 28, 2021 as the deadline to complete fact discovery related to class certification. Although the parties have been diligently working to conduct discovery and resolve disputes that have arisen without Court intervention, the parties do not believe that discovery can be completed before the current deadline. The parties therefore respectfully request that the Court extend the current case deadlines by 60 days to allow the parties additional time to complete discovery before

STIPULATED MOTION TO EXTEND CASE DEADLINES
(2:16-CV-01941-JLR) - 1

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exchanging expert reports, conducting expert discovery, and briefing Plaintiffs' Motion for Class Certification.

II. STIPULATED MOTION

Under Federal Rule of Civil Procedure 16(b)(4), the Court may modify the case schedule on a showing of good cause.

Here, the parties agree that good cause exists to extend the current case deadlines by 60 days. The parties have been actively working to complete discovery before the current deadline. Both parties have served discovery requests, provided written responses, and produced documents. Plaintiffs also deposed three Valve witnesses. Valve originally noted depositions of the named Plaintiffs and their children, but those depositions needed to be postponed because Valve has not yet received complete document productions from Plaintiffs. The parties have also been working together to try to resolve discovery disputes that have arisen without Court involvement.

Although the parties have been actively working to complete discovery, they will need additional time to fully complete discovery, including depositions, and to continue to attempt to resolve discovery disputes without Court involvement. The requested extension will not affect the trial date because a trial date has not yet been set for this case. *See* Dkt. #81 at 2. The parties further agree that neither party will be prejudiced by the requested extension. The parties' request is not made for the purpose of improper delay or to burden the Court.

Accordingly, the parties respectfully request that the Court extend the case deadlines to reflect the following proposed dates:

EVENT	CURRENT DEADLINE	NEW DEADLINE (STIPULATED)
Deadline to complete fact discovery related to class certification	May 28, 2021	July 27, 2021

1	Plaintiffs' deadline to disclose experts for class certification pursuant to Fed. R. Civ. P. 26(a)(2)	June 4, 2021	August 3, 2021
2			
3			
4	Valve's deadline to disclose experts for class certification pursuant to Fed. R. Civ. P. 26(a)(2)	July 6, 2021	September 3, 2021
5			
6			
7	Deadline to complete expert discovery regarding experts for class certification, including all expert depositions	July 16, 2021	September 14, 2021
8			
9			
10	Deadline to file Plaintiffs' Motion for Class Certification accompanied by the evidence and declarations on which Plaintiffs rely in seeking class certification	July 30, 2021	September 28, 2021
11			
12			
13	Deadline to file Valve's Opposition to Plaintiffs' Motion for Class Certification accompanied by the evidence and declarations on which Valve relies in opposing class certification	September 29, 2021	November 29, 2021
14			
15			
16			
17	Deadline to file Plaintiffs' Reply Brief in Support of Motion for Class Certification	October 29, 201	December 28, 2021
18			
19			

III. CONCLUSION

The parties respectfully request that the Court extend the case deadlines to reflect the dates proposed above.

1 DATED this 24th day of May, 2021.

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3 JONES WARD PLC

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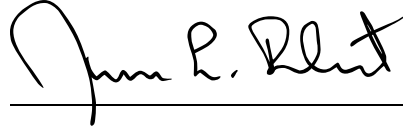
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Attorneys for Plaintiffs

Attorneys for Defendant Valve Corporation

ORDER

Based on the foregoing stipulated motion of the parties and for good cause appearing, IT
IS SO ORDERED.

DATED this 25th day of May, 2021.



The Honorable James L. Robart
United States District Court Judge

Presented by:

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